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12/16/2019

Permit Application Number SAJ-2011-00551 (SP-TSH)

Formerly: SAJ-2011-00551 (IP-TEH)

Formerly: SAJ-1998-2682 (IP-MN); Ridge Road Extension (RRE)

Colonel Andrew D. Kelly
Commander, Jacksonville District
U.S. Army Corps of Engineers
701 San Marco Blvd.
Jacksonville, FL 32207-8175

Shawn Zinszer,
Chief, Regulatory Division
Jacksonville District
U.S. Army Corps of Engineers
701 San Marco Blvd.
Jacksonville, FL 32207-8175

Dear Colonel Kelly, Regulatory Chief Zinszer,

Please put this Comment # 35 into the Administrative Record.

NOTE TO THE READER

THIS COMMENT IS DESIGNED TO ACHIEVE TWO PURPOSES:

1--PROVIDE NEW EVIDENCE NOT KNOWN BY THE FEDERAL REVIEWING AGENCIES, AND

2—PROVIDE ADDITIONAL INFORMATION AND MAPS TO ASSIST ANY FEDERAL JUDICIARY AGENT, SHOULD IT COME TO THAT EVENTUALITY, IN COMPREHENDING THIS COMPLICATED 21 YEAR OLD APPLICATION THAT HAS HAD 4 ACOE PROJECT MANAGERS (SUMMA, NOWICKI, HURST & HAYES), 3 SECTION CHIEFS (SCHNEPEL, O’KANE & HAYES), 2 ACOE REGULATORY CHIEFS (KINARD, ZINSZER), 1 DEPUTY CHIEF (WHITE), 3 PUBLIC NOTICES, 2 WITHDRAWALS, 21 YEARS OF PUBLIC COMMENTS AND OPPOSITION AND, AS SUCH, HAS BECOME FOR THE FEDERAL REVIEWING AGENCIES, UNMANAGEABLE.

SUMMARY

THIS COMMENT CONTAINS NEW INFORMATION REGARDING THE CURRENT ONGOING PROGRESS OF CONSTRUCTION OF ALTERNATIVE # 10, 4-LANE TOWER ROAD EAST OF THE SUNCOAST PARKWAY, ALREADY DETERMINED TO BE ‘PRACTICABLE’ BY THE ACOE.

CONSTRUCTION HAS BEGUN IN THE PAST 4 WEEKS ON A NEW 1.2-MILE SECTION OF TOWER ROAD (SEE PHOTO EVIDENCE BELOW) AND WHEN FINISHED, WILL MAKE THAT 11.8-MILE ALTERNATIVE ALMOST ONE HALF COMPLETED AND IN USE FOR 5.66 MILES. THERE ARE ONLY 6.14 MILES LEFT TO COMPLETE TO GO TO U.S. 41 AND ACHIEVE THE PROJECT PURPOSE. DIRECT WETLAND IMPACTS REMAINING WILL BE REDUCED FROM 22.2 ACRES, ACCORDING TO PASCO’S RECENT 09/2019 ALTERNATIVES ANALYSIS (AA) ADDENDUM, DOWN TO 1.86 ACRES.

THIS ‘PRACTICABLE’ ALTERNATIVE # 10, NOW IN 12/2019, IS BY FAR MORE OF A LEDPA THAN ANY ARTERIAL CONTAINING THE RRE.

AND THE TOWER ROAD ALTERNATIVE # 10 IS JUST ONE EXAMPLE OF 5-6 OTHER ALTERNATIVES THAT ARE MORE QUALIFIED TO BE DESIGNATED AS THE LEDPA. THE RRE MOD 7A ARTERIAL HAS NOW BECOME ONE OF THE MOST, NOT LEAST, ENVIRONMENTALLY DAMAGING ALTERNATIVES.

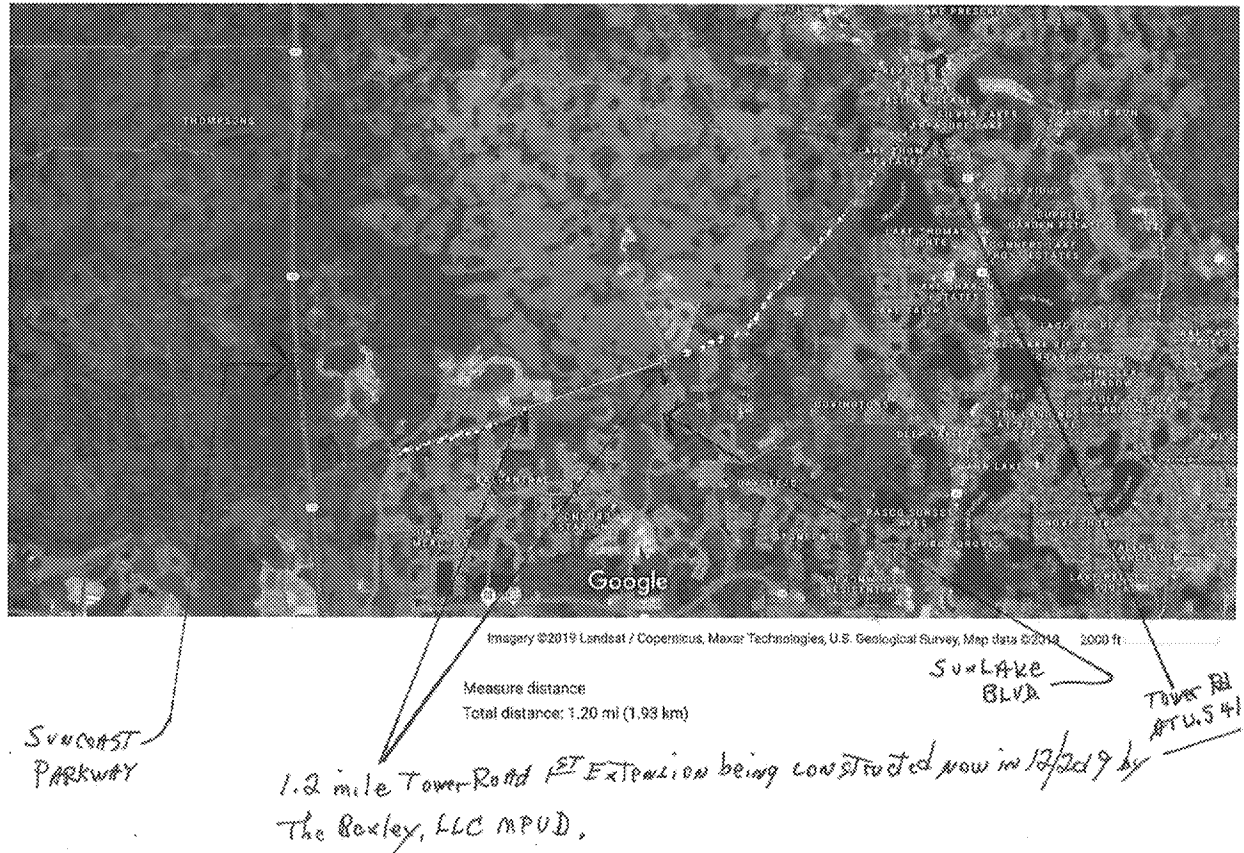
INTRODUCTION

NEW INFORMATION ABOUT ALTERNATIVE # 10 TOWER ROAD WAS SUBMITTED TWO WEEKS AGO IN COMMENT # 34. IT INCLUDED DATA REGARDING A PROPOSED NEW \$55 MILLION MOL FLORIDA TURNPIKE ENTERPRISE (FTE) FULL INTERCHANGE AT THE TOWER ROAD AND SUNCOAST PARKWAY LOCATION. NOW, A RECENT DRIVE ON 12/09/2019 TO THE INTERSECTION OF TOWER ROAD AND SUNLAKE BOULEVARD, EAST OF THE PARKWAY, REVEALED THAT CONSTRUCTION HAS ALREADY BEGUN ON THE 1.2-MILE SEGMENT FROM THAT TOWER ROAD/SUNLAKE BLVD. INTERSECTION WEST TO CONNECT TO TOWER ROAD AT THE BALLANTRAE BLVD. INTERSECTION. IT WILL EXTEND THE CURRENT 1.39 MILE TOWER ROAD IN THE BEXLEY RANCH MPUD, EAST FOR ANOTHER 1.2 MILES AND END AT SUNLAKE BLVD.

ON PAGE 23 OF THE LAST COMMENT # 34 SUBMITTED ON 12/02/2019, REFERRING TO THAT 1.2-MILE SEGMENT, WE STATED THAT:

“A RECENT DRIVE TO THAT LOCATION SHOWED THAT IT HAS NOT YET STARTED CONSTRUCTION AND IS STILL A DIRT ROAD.”

THAT STATEMENT IS NO LONGER TRUE. THE ANNOTATED MAP BELOW SHOWS THE LOCATION OF THE 1.2-MILE TOWER ROAD SEGMENT WHERE THE NNP BEXLEY, LLC MPUD HAS BEGUN THE LAND CLEARING AND BURNING PROCESS ON THAT TOWER ROAD SEGMENT. THE MAP SHOWS THE LOCATION OF THE CONSTRUCTION OF THE 1.2 MILE TOWER ROAD THAT JUST BEGAN SEVERAL WEEKS AGO.



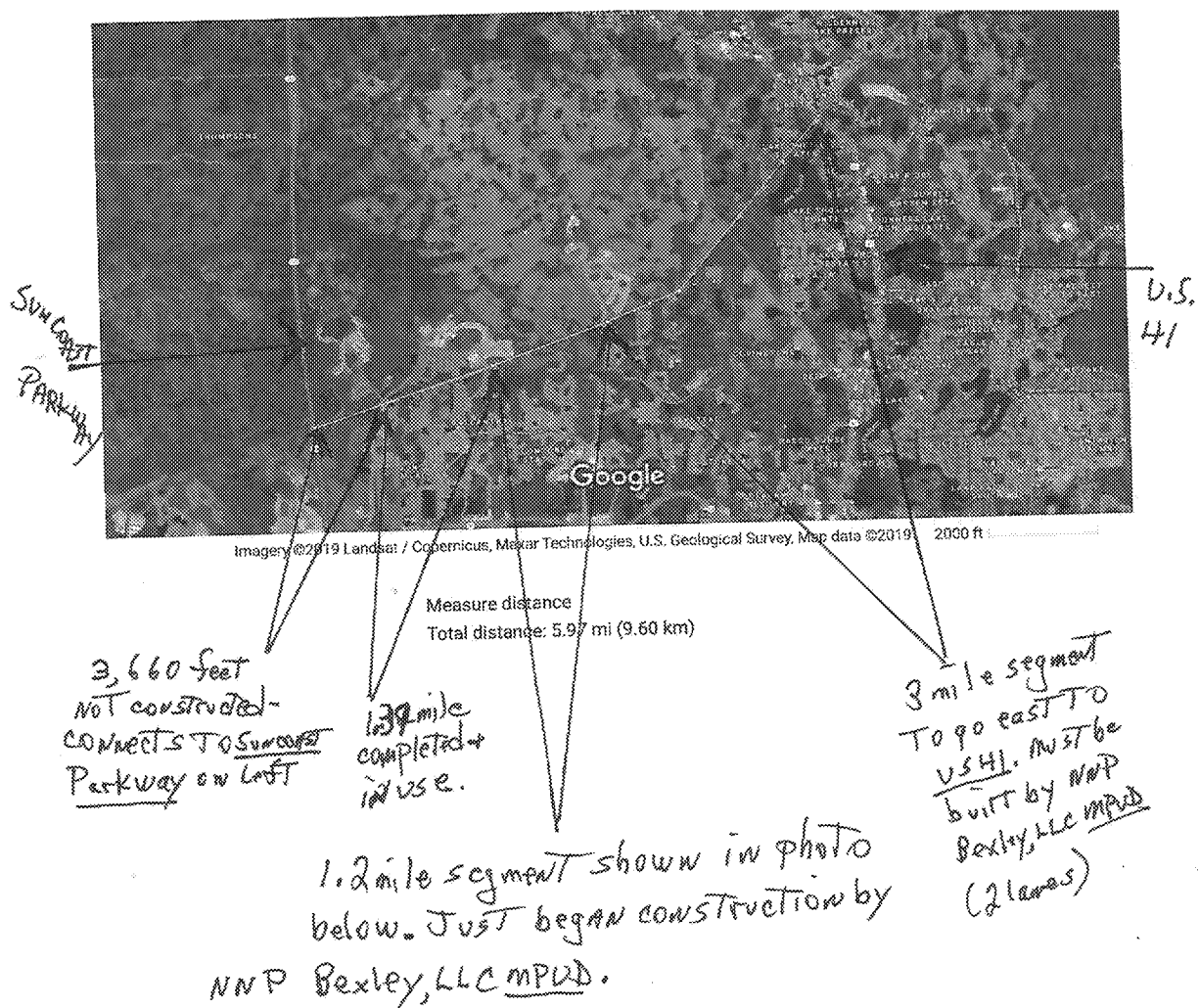
<https://www.google.com/maps/search/TOWER+ROAD+%26+SUNCOAST+PARKWAY/@28.2285814,-82.5066162,7879m/data=!3m1!1e3>

ACOE'S ADELYN IRLANDA OF THE TAMPA OFFICE WAS QUOTED IN OUR LAST COMMENT # 34 STATING THAT ALL WETLAND IMPACTS FOR THE ABOVE 1.2 MILE TOWER ROAD EXTENSION HAVE BEEN PERMITTED BY THE ACOE:

"From what I'm able to see, it appears the portion of Tower Road that you are referring to is part of another phase of the Bexley development so I imagine it will eventually be extended. Currently, the permit is good until 2024, meaning it could be a while before the roadway is extended."

THAT WAS 3 WEEKS AGO. IT APPEARS THAT THE LAND CLEARING PROCESS FOR THAT SEGMENT OF TOWER ROAD WAS ALREADY IN PROGRESS AS ACOE'S ADELYN WAS WRITING THAT RESPONSE.

THE MAP BELOW SHOWS THE ENTIRE 11.8 MILES OF THE 4-LANE TOWER ROAD ALTERNATIVE # 10 FROM STARKEY BLVD. TO THE WEST (LEFT), EAST ACROSS THE SUNCOAST PARKWAY TO U.S. 41, THE ACOE-DEFINED PROJECT LIMITS.



note: The 5.98 mile segment of Tower Road East of the Suncoast Parkway to U.S. 41 compares to Phase 2 of the RRE. 2.32 miles, Almost 1/2 of it, has been completed + in use OR is now in 12/2019 under construction. All wetland impacts for that have been permitted + mitigated for.

THE ABOVE ANNOTATIONS CAN BE USED TO MAKE A COMPARISON BETWEEN PHASE 2 OF THE RRE MOD 7A EAST OF THE PARKWAY AND THE TOWER ROAD ALTERNATIVE SEGMENT ALSO EAST OF THE PARKWAY. THAT TOWER ROAD SEGMENT, IS 5.78 MILES LONG AND ALMOST ONE HALF OF THAT 2-LANE SEGMENT (2.59 MILES) WILL NOW IN 2019 – 2020 BE

COMPLETED BY THE DEVELOPER OF THAT MPUD (NNP BEXLEY, LLC) AND BE IN USE. THAT INCLUDES, AS PER THE CONDITIONS OF THAT MPUD, A DONATION OF ALL LANDS FOR THE EVENTUAL 4-LANING OF TOWER ROAD, AND ALSO INCLUDES LANDS THAT MUST BE DONATED FOR ALL FLOODPLAIN AND STORMWATER PONDS.

BELOW IS A SUMMARY OF THE WETLAND IMPACTS FOR THE TOWER ROAD ALTERNATIVE THAT HAVE ALREADY BEEN PERMITTED, TAKEN (OR ARE CURRENTLY BEING TAKEN) AND MITIGATED FOR.

1—PASCO'S 09/2019 ADDENDUM TO THEIR 08/2019 UPDATED SUPPLEMENTAL AA LISTED DIRECT WETLAND IMPACTS FOR ALTERNATIVE # 10, 4-LANE TOWER ROAD, PAGE 50—REVISED TABLE 4-1, AT 22.2 ACRES.

2—THE LAST COMMENT # 34 PRESENTED EVIDENCE THAT SWFWMD'S DAVE SAUSKOJUS VERIFIED PERMITTING THE FILLING OF 9.41 ACRES OF WETLANDS FOR TOWER ROAD (AKA RANGELAND BLVD.) WEST OF THE SUNCOAST PARKWAY IN THE STARKEY RANCH MPUD, AND CONCEPTUALLY APPROVED AN ADDITIONAL 4.27 ACRES OF TOWER ROAD IN THAT DEVELOPMENT. THAT ADDS UP TO 13.68 ACRES. ALMOST THAT ENTIRE 3.07-MILE TOWER ROAD SEGMENT IN THE STARKEY RANCH MPUD ON THE WESTERN END OF THE TOWER ROAD ALTERNATIVE IS NOW, IN 12/2019, COMPLETE AND IN USE.

3—ON THE EASTERN SIDE OF THE SUNCOAST PARKWAY, THE BEXLEY RANCH MPUD COMPLETED A 1.39 MILE SEGMENT OF TOWER ROAD AND WAS AUTHORIZED TO FILL 1.08 ACRES OF WETLANDS.

4—AND NOW IN 12/2019, WORK HAS BEGUN ON A 1.2 MILE EASTERN EXTENSION OF TOWER ROAD FROM BALLANTRAE BOULEVARD AS DESCRIBED IN # 3 ABOVE. THAT HAS BEEN APPROVED BY THE ACOE AND SWFWMD TO FILL 5.27 ACRES OF WETLANDS.

TOTAL DIRECT WETLAND IMPACTS FOR ALTERNATIVE # 10 AS OF 12/2019:

ADDING UP ALL OF THE WETLAND ACREAGE TAKEN FOR THE THREE TOWER ROAD PROJECTS DESCRIBED ABOVE GIVES:

9.41 ACRES + 4.27 ACRES + 1.39 ACRES + 5.27 ACRES = 20.34 ACRES OF DIRECT WETLAND IMPACTS SO FAR PERMITTED AND TAKEN, OR CURRENTLY BEING TAKEN, FOR THE TOWER ROAD ALTERNATIVE # 10.

SUBTRACTING 20.34 ACRES OF DIRECT WETLAND IMPACTS FROM PASCO'S LATEST REPORT OF 22.2 ACRES ON THEIR UPDATED 09/2019 AA ADDENDUM, FOR ALL 11.8 MILES OF THE TOWER ROAD ALTERNATIVE, LEAVES A REMAINDER OF 1.86 ACRES OF DIRECT WETLAND IMPACTS.

(NOTE—WE HAVE LOOKED CLOSELY USING GOOGLE EARTH AT THE AS YET UNBUILT SEGMENTS OF THE TOWER ROAD ALTERNATIVE AND IT APPEARS THAT THE 142-FOOT WIDTH

OF THE ROW TO BE SET ASIDE BY DEVELOPERS AND LANDOWNERS (SEE BELOW) MIGHT ENCROACH INTO WETLAND AREAS. IT APPEARS THAT SOMETHING SEEMS WRONG EITHER WITH OUR MATH RESULTING IN 1.86 ACRES OF WETLAND IMPACTS REMAINING FOR OVER HALF OF THE LENGTH OF TOWER ROAD STILL TO BE CONSTRUCTED, OR WITH THE SUBMITTALS FROM PASCO COUNTY. ONLY A COMPLETE ON SITE AND GROUND-TRUTHED ENVIRONMENTAL IMPACT STUDY, REQUIRED BY THE ACOE AND EPA, CAN DETERMINE THE EXACT AMOUNT OF WETLAND IMPACTS THAT WILL ACTUALLY OCCUR, SO THAT A TRUE LEDPA CAN BE DETERMINED BY THE ACOE.

NOTE--THE 142 FOOT WIDTH OF TOWER ROAD THROUGH ASTURIA AND THE STARKEY RANCH MPUID CAN BE CONFIRMED AT:

<https://docplayer.net/amp/141928470-Pasco-county-florida-interoffice-memorandum.html>

“Corridor Preservation Right-of-Way Requirements: Tower Road 142 feet...” AND

http://egov.pascocountyfl.net/Content/ECM/ConsolidatedAgendas/BCC_LPA_10-04-2011/PGM12-11_0_Attach_3_MRPP.pdf

MAP SHOWS 142 FOOT ROW

TOTAL COMPLETED, OR SOON TO BE COMPLETED AND BE IN USE, DISTANCE OF ALTERNATIVE # 10 AS OF 12/2019:

ADDING THE 1.2-MILE DISTANCE OF THE TOWER ROAD 1ST EXTENSION CURRENTLY UNDER CONSTRUCTION DESCRIBED IN THIS COMMENT, TO THE DISTANCES OF THE SEGMENTS ALREADY CONSTRUCTED IN THE STARKEY RANCH MPUD WEST OF THE PARKWAY (3.07 MILES) AND THE BEXLEY RANCH MPUD EAST OF THE PARKWAY (1.39 MILES), GIVES A TOTAL OF 5.66 MILES OF THE TOWER ROAD ALTERNATIVE ALREADY, OR SOON TO BE, IN USE AS OF 12/2019. SO, ALTERNATIVE # 10 IS ALMOST ½ FINISHED. THAT LEAVES ONLY 6.14 MILES TO BE COMPLETED, WITH MUCH OF THAT (2 LANES) TO BE DONE BY THE NNP BEXLEY, LLC MPUD. THE 6.14-MILE REMAINDER INCLUDES A DONATION OF THE ROW NEEDED FOR ALL REQUIRED FLOODPLAIN AND STORMWATER COMPENSATION PONDS FOR AN EVENTUAL 11.8-MILE 4-LANE TOWER ROAD ARTERIAL, AS DESCRIBED ON PASCO'S 2040 AND 2045 LRTP'S. (SEE APPENDIX # 1)

ALL PHOTOS OF THE RECENT START OF CONSTRUCTION OF THE 1.2 MILE TOWER ROAD 1ST EXTENSION BELOW WERE TAKEN ON 12/09/2019. THE PHOTO BELOW SHOWS THE

**INTERSECTION OF TOWER ROAD AND SUNLAKE BLVD. LOOKING WEST TOWARD THE
SUNCOAST PARKWAY. NOTE HOW THE TOWER ROAD RIGHT OF WAY HAS BEEN CLEARED
AND, IN THE BACKGROUND, SMOKE FROM THE BURNING OF THAT CLEARED MATERIAL.**



BELOW IS A CLOSE UP OF THE ABOVE SHOWING THE INTERSECTION SIGN FOR TOWER ROAD
& SUNLAKE BLVD.



**SAME SCENE AS ABOVE LOOKING WEST TOWARD THE PARKWAY SHOWING THE TOWER
ROAD ROW ALREADY HAVING BEEN CLEARED.**



THE NEXT TWO PHOTOS ARE THE SAME SCENE AS ABOVE, ZOOMED IN.





THE BELOW PHOTO WAS TAKEN FROM THE SAME INTERSECTION BUT LOOKING IN THE OPPOSITE DIRECTION (EAST) AND ENDING AT U.S. 41. IT IS 3 MILES LONG MOL AND TWO OF THE FOUR LANES OF THE ARTERIAL 4-LANE TOWER ROAD (AS PER THE PASCO 2040 & 2045 LRTP) MUST BE CONSTRUCTED BY THE NNP BEXLEY, LLC MPUD, AND INCLUDES THE DONATION OF ROW BY THAT MPUD FOR ALL FLOODPLAIN & STORMWATER PONDS.



THE NEXT 3 PHOTOS WERE TAKEN FROM THE OTHER (WESTERN) END OF THIS 1.2-MILE TOWER ROAD 1ST EXTENSION JUST EAST OF THE INTERSECTION OF TOWER ROAD AND BALLANTRAE BLVD. THEY ARE PHOTOS LOOKING EAST TOWARD SUNLAKE BLVD. NOTE THE EARTHMOVING EQUIPMENT IN THE DISTANCE IN THE THIRD PHOTO.







BELOW IS A MAP OF THE 3.07-MILE LONG TOWER ROAD ALTERNATIVE # 10 ON THE STARKEY RANCH MPUD (NAME CHANGED TO RANGELAND BLVD.) WITH 9.41 ACRES OF DIRECT WETLANDS IMPACTS (NOT INCLUDING THE 4.27 ACRES CONCEPTUALLY APPROVED BY THE SWFWMD). PASCO MUST CONSTRUCT THE 2.64-MILE 4 LANE SEGMENT EAST OF THERE TO THE PARKWAY, WITH THE LANDOWNERS/DEVELOPERS (ASTURIA & BEHNKE) DONATING ALL LAND FOR THE ROW AND FOR THE REQUIRED PONDS.

STARKEY
BLVD.



Imagery ©2019 Landsat / Copernicus, Maxar Technologies, U.S. Geological Survey, Map data ©2019 2000 ft

Measure distance
Total distance: 5.83 mi (9.38 km)

3.07 mile Tower Rd through
Starkey Ranch (AKA Rangeland
Blvd.) 9.41 Acres of wetland
impacts were permitted &
mitigated for. Almost all of
the 3.07 miles is now in
12/2019 in use.

The 2.64 mile
segment east of the
Starkey Ranch Tower Rd
to the Suncoast Parkway.
It goes through the Astoria
& Behrke properties. All
ROW for Tower Rd & Floodplain
& stormwater ponds was
donated as MPUD conditions
Pasco must build this
segment.

EVIDENCE HAS ALREADY BEEN SUBMITTED IN PAST COMMENTS THAT WITHOUT PROJECT ARTHUR’S APPROVAL OF THE RRE, IT CAN NEVER HAPPEN. THAT MEANS THE ACOE-DEFINED PROJECT PURPOSE TO GO EAST TO U.S. 41 WILL NEVER BE MET AND THE RRE CANNOT BE THE LEDPA.

PASCO COUNTY CANNOT REQUIRE THE DEVELOPERS OF PROJECT ARTHUR TO CONSTRUCT PHASE 2 OF THE RRE BECAUSE ALL FINAL ROADWAY DECISIONS ARE TO BE MADE BY PROJECT ARTHUR (SEE BELOW) AND THOSE DECISIONS ‘SUPERCEDE’ ANY ROADWAY DECISIONS BY PASCO COUNTY. THAT “SUPERCEDENCE” CONDITION WAS APPROVED BY THE PASCO BOCC (ALSO SEE BELOW).

THE ADMINISTRATIVE RECORD ALREADY CONTAINS THE EVIDENCE THAT PROJECT ARTHUR WANTS NOTHING TO DO WITH THE E/W RRE. ACCORDING TO THEM, ALL OF THEIR INGRESS AND EGRESS NEEDS FOR THAT DEVELOPMENT WOULD BE ADEQUATELY PROVIDED FOR BY THE N/S SUNCOAST PARKWAY (FTE CONDUCTING A PD&E STUDY TO BE WIDENED FROM CURRENT 4 LANES—SEE APPENDIX # 5), E/W STATE ROAD 52, THE NORTHERN EXTENSION OF SUNLAKE BLVD., AND TWO OTHER ROADWAYS TO BE EXTENDED WEST FROM U.S. 41 INTO THAT DEVELOPMENT. BECAUSE OF THAT, IT IS VERY PROBABLE THAT PHASE 2 OF THE RRE WILL NEVER BE CONSTRUCTED. AND SINCE PASCO HAS APPROVED OF THE COMPREHENSIVE PLAN AND MPUD “CONDITION” THAT PROJECT ARTHUR IS TO BE THE FINAL DECISION MAKER IN ALL ROADWAY MATTERS WITHIN THEIR ALMOST 7,000 ACRE DEVELOPMENT, PASCO CANNOT FORCE PROJECT ARTHUR TO CONSTRUCT ANY ROADWAY, INCLUDING THE RRE. NOR CAN THEY CONSTRUCT PHASE 2 OF THE RRE IN PROJECT ARTHUR’S DEVELOPMENT WITHOUT THEIR CONSENT. NOR CAN PASCO DISALLOW ANY 20 MPH SPEED LIMIT ON ROUNDABOUTS PROJECT ARTHUR MAY WANT TO ADD TO ANY ROADWAYS, INCLUDING THE RRE, IN THEIR DEVELOPMENT.

THE ADMINISTRATIVE RECORD ALSO CONTAINS PASCO COUNTY’S RRE PROJECT MANAGER SAM BENECK OBJECTING TO THE ABOVE REFERENCED “CONDITION” GIVING PROJECT ARTHUR UNILATERAL AND TOTAL DECISION-MAKING CONTROL REGARDING THE EXISTENCE OF ANY AND ALL ROADS IN THEIR DEVELOPMENT. THAT OBJECTION FELL ON DEAF EARS AND WAS INGORED BY THE PASCO BOCC.

IT APPEARS THAT PASCO COUNTY KNOWS FULL WELL THERE MAY BE NO CHANCE THAT PHASE 2 OF THE RRE WILL EVER HAPPEN, AT LEAST NOT IN THE FIVE-YEAR VALIDITY PERIOD OF A CWA 404 PERMIT. SO PASCO’S ADDITION OF PHASE 2 TO THEIR 2045 LRTP FOR THE 2020 – 2024 TIME PERIOD WAS SIMPLY A DISINGENUOUS “PLOY” TO REMOVE THAT PARTICULAR OBSTACLE (ONE OF MANY) TO THEIR RECEIVING A PERMIT FOR A PROJECT THAT,

UP TO NOW, HAS ALWAYS BEEN ONLY FOR PHASE 1—ONE HALF OF A PROJECT THAT, AS SUCH, WOULD BE INELIGIBLE FOR A CWA 404 PERMIT. IN REALITY, PASCO HAS NO INTENTION OF EVER BUILDING PHASE 2, AND THEY CANNOT FORCE PROJECT ARTHUR TO CONSTRUCT IT, NOR FORCE PROJECT ARTHUR TO ACCEPT IT AS A FAIT ACCOMPLI IF PASCO WANTS TO CONSTRUCT IT.

EVIDENCE SUPPORTING THE FACT THAT PROJECT ARTHUR WANTS NOTHING TO DO WITH THE E/W RRE MOD 7A ARTERIAL, AND THAT DECISION IS SOLELY PROJECT ARTHUR'S TO MAKE.

COMMENT INSERT—BELOW IS EVIDENCE OF THE DECLARATION BY THE DEVELOPER LENNAR HOMES, EAST OF THE PARKWAY, IN THEIR “Pasco County Large Scale Comprehensive Plan Amendment - CPAL 19(01) Project Arthur” THAT THEY HAVE ABSOLUTELY NO INTEREST IN THE RRE. IT IS TO BE FOUND AT:

<https://pascocountyfl.net/DocumentCenter/View/50852/Transmittal-Package-Proposed---CPAL1901--Project-Arthur?bidId=>

88 PAGES

December 18, 2018 Mr. D. Ray Eubanks Plan Processing Administrator Florida Department of Economic Opportunity Division of Community Development 107 East Madison Street Caldwell Bldg., MSC 160 Tallahassee, FL 32399-0800

RE: Pasco County Large Scale Comprehensive Plan Amendment - CPAL 19(01) Project Arthur

Dear Mr. Eubanks:

PAGE 36--TRANSPORTATION

Introduction

The creation of efficient and effective transportation networks is highly dependent upon the coordination of many factors, including land use, natural resources, population, and the availability of technology, to name a few. The provision of multimodal options in a community helps to meet the needs of its residents and workforce. The primary and secondary roadway network anticipated to support the vehicular need for the Project Arthur Parcel B will be conceptually located on the MPUD Master Plan;

The specific transportation policies set forth in Section 9 within Project Arthur Parcel B shall supersede any conflicting transportation policies in

Pasco County's adopted Comprehensive Plan and Land Development Code, as amended from time-to-time.

COMMENT INSERT—THE ABOVE IS A DIRECT REFERENCE TO PROJECT ARTHUR NOT WANTING ANY PART OF THE RRE.

PAGE 57

COMMENT INSERT—BELOW, PROJECT ARTHUR AGAIN REITERATED THEIR AVERSION TO THE RAPID MOVEMENT OF TRAFFIC THROUGH THEIR DEVELOPMENT, AND MADE A POINT OF INCLUDING TRAFFIC CALMING METHODS LIKE ROUNDABOUTS WITH A 20 MPH SPEED LIMIT.

Examples of traffic calming measures include, but are not limited to, roundabouts, on-street parking, narrow streets and travel lanes, speed tables, bulb outs or curb extensions, raised crosswalks, and designated bicycle and multipurpose lanes. Again, the rapid movement of vehicular traffic through the community is not the primary method to achieve a sense of place.

AND

COMMENT INSERT— THE "SUPERCEDENCE" CONDITION THAT THE PASCO BOCC APPROVED ON 6-19-2019 GAVE PROJECT ARTHUR COMPLETE AND FINAL CONTROL OVER ALL ROADWAY DECISIONS IN THEIR DEVELOPMENT.

<https://www.pascocountyfl.net/6/Pasco-Agendas-Minutes>

ITEM P-6, ATTACHMENT 3 AT:

<http://pasco.siretechnologies.com/Sirepub/cache/2/d45jaypfpl0pjyalbknsqm4h/194222312122019033921386.PDF>

363 PAGE MPUD CONDITIONS OF APPROVAL

**PROJECT ARTHUR
MASTER PLANNED UNIT DEVELOPMENT
CONDITIONS OF APPROVAL
REZONING PETITION NO. 7371**

Parcel A Conditions of Approval

General

FROM PAGE 113 TO 193 OF 363

COMMENT INSERT—THE PASCO BOCC APPROVED THE PROPOSAL BY PROJECT ARTHUR TO ALLOW ROUNDABOUTS "...ON ALL ROADWAY TYPES WITHIN THE PROJECT" AND APPROVED

PROJECT ARTHUR'S RESTRICTION THAT ANY ROADWAY DECISION BY PROJECT ARTHUR "... shall supersede any conflicting transportation policies in Pasco County's adopted Comprehensive Plan and Land Development Code..." THAT MEANS THAT IF PROJECT ARTHUR DECIDES THEY DO NOT WANT THE E/W RRE GOING THROUGH THEIR DEVELOPMENT, THEN THAT DECISION WILL "SUPERCEDE" ANY PLANS BY PASCO COUNTY AND PHASE 2 WILL NEVER BE CONSTRUCTED. IT ALSO MEANS THAT IF PHASE 2 IS EVER CONSTRUCTED, THEN PROJECT ARTHUR CAN LEGALLY ADD ROUNDABOUTS WITH 20 MPH SPEED LIMITS. THAT IN EFFECT WOULD RENDER PHASE 2 OF THE RRE A "COLLECTOR" ROADWAY AND NO LONGER AN "ARTERIAL" ROADWAY, AS PASCO KEEPS TELLING THE ACOE IT IS SUPPOSED TO BE—TO BETTER SUIT PASCO'S PURPOSE TO JUSTIFY THE RRE AS A HURRICANE EVACUATION ROUTE.

PASCO COUNTY HAS FOR YEARS STATED THAT THE PRESENCE OF ROUNDABOUTS ON TOWER ROAD IN THE STARKEY RANCH MPUD MADE THAT ALTERNATIVE UNACCEPTABLE, SINCE THOSE ROUNDABOUTS WOULD INTERFERE WITH THE RAPID MOVEMENT OF TRAFFIC. SO, THE SAME NOW HOLDS TRUE FOR PHASE 2 OF THE RRE, IF IT IS EVER CONSTRUCTED. IT TOO, BY PASCO COUNTY'S OWN DEFINITION, WOULD NOT BE ACCEPTABLE FOR THE PURPOSES OF MOVING HIGH VOLUMES OF TRAFFIC IN A HURRICANE EVACUATION, OR PROVIDE HIGH VOLUMES OF TRAFFIC FLOW TO RELIEVE CONGESTION ON OTHER PASCO E/W ROADWAYS.

THIS ALREADY BOCC-APPROVED PROJECT ARTHUR MPUD MADE SPECIAL REFERENCE TO PROJECT ARTHUR'S SPECIFIC REQUIREMENTS THAT THEIR DEVELOPMENT:

"...should not have its main priority focus on the rapid movement of the automobile through the community."

"...those traveling greater distances to and from work in Project Arthur Parcel B from outside the community will have the adjacent Suncoast Expressway and S.R. 52 to get to and from work."

"Again, the rapid movement of vehicular traffic through the community is not the primary method to achieve a sense of place."

AND

Conditions of Approval Exhibit "A" Master Roadway Plan

PAGE 145

k) Roundabouts. Roundabouts shall be designed per the FDOT Design Standards, latest edition. The posted speed for roundabouts shall be 20 mph. The following FDOT Exhibits (213-4 and 213-5) are for illustration purposes only. Roundabouts may be allowed on all roadway types within the project.

**LATEST (12/2019) UPDATE OF COST ESTIMATES FOR THE RRE MOD 7A
ARTERIAL, FROM PASCO COUNTY'S OWN WEBSITE AND SUBMITTALS
TO THE ACOE.**

BELOW IS FROM THE JUST APPROVED (12/11/2019) PASCO MPO 2045 LRTP TO BE SENT TO THE FHWA. IT SHOWS PASCO ACCEPTING RESPONSIBILITY FOR THE CONSTRUCTION OF PHASE 2 OF THE RRE. WE QUESTION IF THEIR MOTIVE WAS, IN ACTUALITY, JUST TO REMOVE ONE OF MANY OBSTACLES TO RECEIVING A CWA 404 PERMIT, BY SHOWING THAT THEY INTEND TO CONSTRUCT ALL OF THE PROPOSED PROJECT AND NOT JUST PHASE 1. PASCO HAS FOR YEARS LISTED THE COST OF PHASE 2 TO BE OVER \$74 MILLION (SEE BELOW). NOW BELOW THEY LIST IT AS \$48 MILLION. IS THAT ESTIMATED COST TO PASCO JUST FOR THE SEGMENT WEST OF THE CSX RR TRACKS? AND DOES THAT ASSUME THAT PROJECT ARTHUR WILL CONSTRUCT THE SEGMENT FROM THE PARKWAY WEST TO THOSE CSX RR TRACKS, AN ASSUMPTION TOTALLY WITHOUT BASIS? THAT WOULD BE A REASONABLE CONCLUSION TO MAKE. HOW CAN THE ACOE AND EPA MAKE ANY KIND OF VALID COST ESTIMATE COMPARISONS BETWEEN ALTERNATIVES WITH SUCH CONFUSING INFORMATION?

<https://pasco.siretechnologies.com/Sirepub/cache/2/d45jaypfpl0pjyalbknsqm4h/203539312112019042059963.PDF>

**2045 Long Range Transportation Plan
Board Adoption Report
to be Adopted December 11, 2019**

PAGE 4-10

3053 Ridge Rd Ext

Suncoast Pkwy US 41 (Land O' Lakes Blvd) -CoGen- 2019 - 2024 **\$48,233,892**

COMMENT INSERT— BELOW IS FROM PASCO'S 2040 LRTP. IT SHOWS THE COST OF PHASE 2 TO BE OVER \$74 MILLION. SO, WHERE DOES PASCO'S MOST RECENT ESTIMATE OF THE COST OF PHASE 2 ABOVE AT \$48 MILLION COME FROM?

(Page 181 of 234)

Table B-2 (cont.)

County Roadway Improvements (YOE)

Project Number	County Project	Improvement	Design Source	Design Timing	Design Cost	ROW Source	ROW Timing	ROW Cost	CST Source	CST Timing	Construction Cost	Total Cost
1	Persimmon Rd from Salamander Dr to Mitchell Blvd	00 to 2U	CoGen	2031-2040	\$245,195	CoGen	2031-2040	\$1,225,976	CoGen	2031-2040	\$2,819,744	\$4,290,916
	Ridge Rd Ext from Suncast Pkwy to US 41	00 to 4D	CoGen	2020-2025	\$3,643,739	CoGen	2026-2030	\$21,417,388	CoGen	2025-2030	\$48,298,994	\$74,321,121
1	Shady Hills Rd from SR 52 to Hermance Cr	2U to 4D	CoGen	2031-2040	\$6,470,670	CoGen	2031-2040	\$32,353,328	CoGen	2031-2040	\$74,412,643	\$113,236,646

COMMENT INSERT—BELOW IS FROM THE RECENT SEPTEMBER 2019 UPDATE TO THE AA ADDENDUM SENT TO THE ACOE BY PASCO COUNTY. PASCO STILL LISTS THE COST OF THE ENTIRE 8.4-MILE RRE TO BE \$102 MILLION. BUT THAT IS INCORRECT, SINCE IT WAS NOT UPDATED AS REQUIRED BY THE ACOE, TO INCLUDE INCREASED COST ESTIMATES BY THE FTE FOR THE INTERCHANGE OF OVER \$2 MILLION, MAKING THE TOTAL COST TO BE OVER \$105 MILLION. AND TO ADD INSULT TO INJURY, PASCO THEN ADDS THE OVER \$48 MILLION COST OF PHASE 2 TO THEIR LRTP, TO BE SENT TO THE FWHA, EVEN THOUGH THAT CONFLICTS WITH THEIR 2040 LRTP COST ESTIMATE FOR PHASE 2 OF OVER \$74 MILLION, A DIFFERENCE OF OVER \$26 MILLION, WHILE TELLING THE ACOE AND EPA THE COST OF THE RRE STILL REMAINS AT \$102 MILLION. NONE OF THIS MAKES ANY SENSE.

Addendum to Alternative Analysis for Ridge Road Extension

PREPARED FOR:

Pasco County Engineering Services Department

PREPARED BY:

NV5, INC.

1713 South Kings Avenue
BRANDON, FLORIDA 33511
July 2019

September 2019 Update

REVISED Table 4-1. Pasco County Ridge Road Extension (Updated 10-16-15)
Expanded Summary Data¹ - Alternatives Analysis

COMMENT INSERT—THIS TABLE HAD ONE ADDITION (MOD 7A-ARTERIAL) AND WAS NEVER REVISED AT ALL, AS PASCO STATED ABOVE THAT IT WAS.

Mod 7A
4-Lane RRE Partially
Elevated 7
Ph II Arterial

COMMENT INSERT—SEE DISCUSSION BELOW.

PASCO REPORTS THEIR TOTAL SHARE OF THE RRE TO BE	\$89,929,000
--	--------------

PASCO REPORTS THE TOTAL COST OF THE RRE WITH THE FTE INTERCHANGE TO BE	\$102,383,000
--	---------------

COMMENT INSERT—PASCO SIMPLY RESUBMITTED THE OLD NUMBERS FROM 10/2015 AND NEVER CORRECTED THE ORIGINAL FTE ESTIMATE FOR THE INTERCHANGE OF \$12,354,000 BY USING THE FTE'S MORE RECENT ESTIMATE OF \$15,055,000. THE TOTAL OF PHASE 1 ONLY, WITH THE INTERCHANGE, SHOULD HAVE READ \$105,025,668, WHICH IS \$2,701,000 MORE THAN WHAT PASCO TOLD THE ACOE IN 09/2019. THIS IS YET ANOTHER EXAMPLE THAT THE "REVISED/UPDATED" SEPTEMBER 2019 ADDENDUM SUBMITTED TO THE ACOE WAS NO REVISION AT ALL, BUT JUST A REPEAT OF THE 10/2015 AA WITH THE ADDITION OF THE MOD 7A ARTERIAL.

ADDING IN \$48,233,892 FOR PHASE 2 FROM PASCO'S 2045 LRTP TO THE CORRECTED ESTIMATE ABOVE OF \$105,025,668 = \$153,259,560. THAT IS THE CURRENT CORRECTED 12/2019 COST ESTIMATE FOR THE ENTIRE 8.4 MILE RRE ACCORDING TO PASCO COUNTY. BUT IF THE COST ESTIMATE FOR PHASE 2, SUBMITTED TO THE FHWA IN PASCO'S 2040 LRTP OF \$74.3 MILLION IS USED, THAT INCREASES THE TOTAL COST OF THE RRE MOD 7A ARTERIAL BY AN ADDITIONAL \$26 MILLION TO \$179,259,560.

AND, AS DISCUSSED IN PAST COMMENT # 34, JUST AS PASCO TOLD THE FHWA IN PASCO'S 2045 LRTP THEY PLANNED TO MAKE TOWER ROAD A 4-LANE ARTERIAL AND THEN, AT THE SAME TIME, TOLD THE ACOE THAT PASCO HAD NO PLANS TO CONSTRUCT THAT TOWER ROAD 4-LANE PROJECT "AT ANY PRICE," SO, IT IS VERY LIKELY THAT PASCO HAS INCLUDED THE CONSTRUCTION OF PHASE 2 OF THE RRE ON THEIR 2045 LRTP BECAUSE THEY WERE TOLD

THAT THE ACOE COULD NOT PERMIT JUST ONE HALF OF A PROJECT. IF PASCO HAD CONTINUED TO STATE, AS THEY HAVE BEEN DOING FOR 2 DECADES, THAT SOME UNKNOWN DEVELOPER ENTITY WOULD CONSTRUCT PHASE 2, THEN THE RRE APPLICATION WOULD HAVE TO BE DENIED ON THAT BASIS ALONE. SO, PASCO INCLUDED PHASE 2 AS THEIR RESPONSIBILITY, AT AN ESTIMATED \$48,233,892 (AND NOT THE 2040 LRTP FIGURE OF \$74.3 MILLION), WHILE HAVING NO INTENTION WHATSOEVER OF CONSTRUCTING PHASE 2. PASCO HAS EXHIBITED THE SAME DEVIOUS BEHAVIORS TOWARD PHASE 2 OF THE RRE AS THEY DID WITH TOWER ROAD IN THEIR 2045 LRTP TO THE FHWA.

THE OVER TWO DECADES LONG PASCO POSITION THAT THEY NEVER HAD THE FUNDS NOR THE INTENTION OF EVER BEING RESPONSIBLE FOR PHASE 2 SHOULD HOLD MORE WEIGHT FOR THE ACOE IN THEIR REVIEW AND FINAL DECISION TO GRANT OR DENY THIS APPLICATION THAN PASCO'S RECENT ATTEMPT TO GIVE THE DUBIOUS IMPRESSION THEY WILL FINALLY ACCEPT RESPONSIBILITY FOR THE CONSTRUCTION OF PHASE 2 IN THEIR JUST APPROVED 2045 LRTP.

IT IS HIGHLY UNLIKELY PASCO HAS ANY REAL INTENTION IN CONSTRUCTING PHASE 2 GIVEN PASCO'S LONG HISTORY OF PLAYING "LOOSE AND FREE" WITH THE TRUTH WHEN IT COMES TO MAKING SUBMISSIONS TO FEDERAL AGENCIES (ACOE & FHWA).

PASCO'S ENTIRE RECENT 09/2019 ALTERNATIVES ANALYSIS MUST BE COMPLETELY REDONE TO REFLECT CURRENT COSTS FOR THE VARIOUS ALTERNATIVES, AS WELL AS CURRENT WETLAND IMPACT NUMBERS, IN LIGHT OF RECENT COMPLETIONS OF LARGE SEGMENTS OF OTHER PRACTICABLE ALTERNATIVES (#10—TOWER ROAD AND STATE ROAD 52 EAST OF THE PARKWAY FROM 2 TO 6 LANES TO U.S. 41) THAT NO LONGER HAVE THE PAST WETLAND IMPACTS LISTED IN THE 2011 AND 2018 PUBLIC NOTICES. HOW ELSE CAN A FINAL LEDPA DECISION BY THE ACOE AND EPA, THAT WOULD HOLD UP UNDER FUTURE JUDICIAL SCRUTINY, BE MADE IF ANY CURRENT COMPARISON OF DAMAGING IMPACTS AMONG THE VARIOUS PRACTICABLE ALTERNATIVES WOULD BE BASED ON OUTDATED AND ERRONEOUS INFORMATION PROVIDED BY THE APPLICANTS?

RESPECTFULLY SUBMITTED,

Dan & Sara Rametta
Richard Sommerville
Save Our Serenova
Citizens For Sanity.Com,Inc.
& The Commenters Group

cc: Brigadier General Diana M Holland, Commander, South Atlantic Division
Clif Payne, Chief, Special Projects and Enforcement Branch
Shayne Hayes, Project Manager

Joshua R. Holmes, Principal Assistant District Counsel for Regulatory
Christina Storz, Assistant District Counsel
Cynthia F. Van Der Wiele, Ph.D, USEPA, Region 4
Annie Dziergowski, USFWS Project Consultation Supervisor
Jacob.A.Siegrist, Regulatory Appeals Review Officer
Edgar.W.Garcia, Project Reviewer

APPENDIX # 1

THE MAP BELOW FROM PAGES 98 & 99 OF THE PASCO COUNTY 2045 LRTP AT:

<http://mobilitypasco.com/wp-content/uploads/2019/12/MOBILITY-2045-LRTP-Adoption-Report-112719.pdf>

IT IS ALSO FOUND AT:

<https://pasco.siretechnologies.com/Sirepub/cache/2/d45jaypfpl0pjyalbknsqm4h/203539312112019042059963.PDF>

**2045 Long Range Transportation Plan Board Adoption Report to be Adopted December 11,
2019 PASCO COUNTY METROPOLITAN PLANNING ORGANIZATION 7530 Little Road, New Port
Richey, FL 34654 phone (727) 847-8140 www.pascoMPO.net**

**PASCO COUNTY MPO MOBILITY 2045 LONG RANGE TRANSPORTATION PLAN BOARD
ADOPTION REPORT Prepared for PASCO COUNTY METROPOLITAN PLANNING ORGANIZATION**

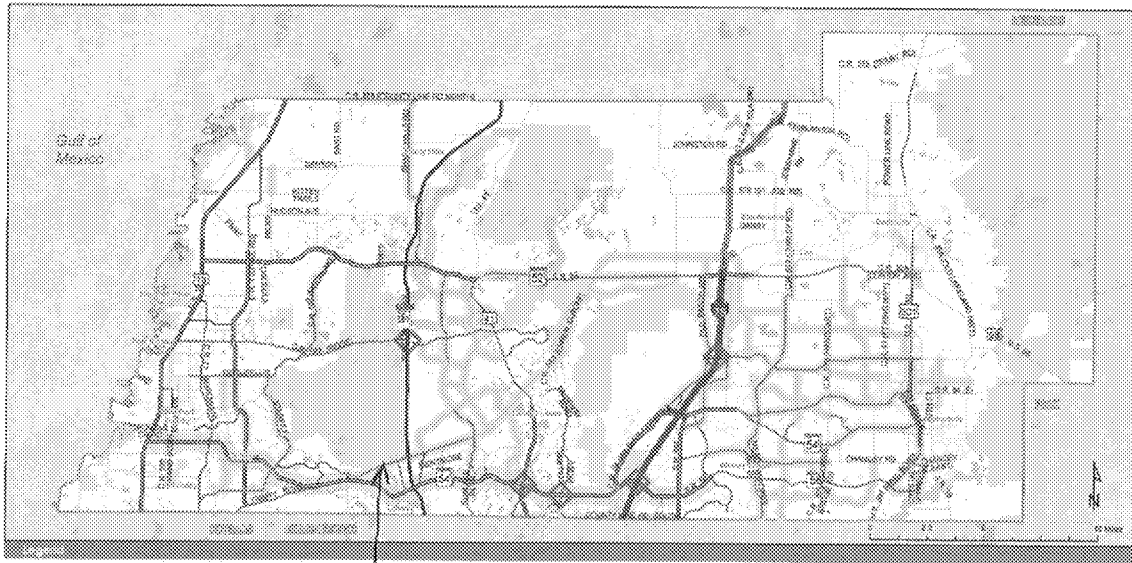
BE IT FURTHER RESOLVED that henceforth the MOBILITY 2045 Long Range Transportation Plan, including all maps, inventories, and other related materials, shall be the basis for future plans, programs, and policies of the Pasco County MPO.

ADOPTED in regular session on the 11th day of December, 2019.

PASCO COUNTY METROPOLITAN PLANNING ORGANIZATION

IT SHOWS THAT TOWER ROAD WILL BE AN ARTERIAL ROADWAY FROM STARKEY BLVD. TO THE WEST FOR 11.8 MILES GOING EAST TO U.S. 41, THE ENTIRE ACOE-DESIGNATED PROJECT PURPOSE AREA/LIMITS. IT ALSO SHOWS THE PROPOSED INTERCHANGE WITH TOWER ROAD AND THE PARKWAY. IT WAS JUST ADOPTED ON 2/11/2019.

Figure 4.2: *Minimum Capacity Investments and Number of Lines (2005-2045)*



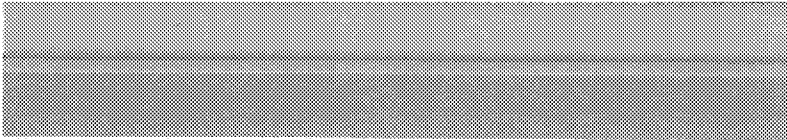
Number of Lanes: 2 Lane Urban, 4 Lane Divided, 6 Lane Divided, 8 Lane Freeway, New / Improved Interchange, 6/8 Lanes Corridor Improvements, 2 Lane Divided, 4 Lane Divided, 6 Lane Freeway, 8 Lane Freeway, 2001-2040 Improvement, Critical Linkages, 2 Lane Undersize, 4 Lane Freeway, 6 Lane Divided, City Limits, Parks and Publicly Owned Land

\$982.5m to get ready for
voters' studies and improvements
along the SR 54/56 Corridor

XOAS LRP - Board Adjudication Report

Tower ROAD, 2045LRTP, ADOPTED 12/11/19 shows 4 LANE
Divided from Starkey ROAD EAST for 11.8 miles TO U.S. 41 - The project limits.

AND FROM THAT SAME 2045 LRTP IT STATES, UNDER THE BELOW FAINT HEADING “EAST/WEST ROADWAY PROJECTS (2025 – 2045),” THAT TOWER ROAD WILL BE 4 LANES DIVIDED (ARTERIAL) FROM GUNN HIGHWAY, WHICH IS THE EASTERN TERMINUS OF TOWER ROAD ALREADY CONSTRUCTED IN THE STARKEY RANCH MPUD, EASTWARD TO U.S. 41.



Chapter 4 MOBILITY 2045 Cost Affordable Plan

Determining the transportation projects and strategies to include in the MOBILITY 2045 Cost Affordable LRTP was based on an evaluation of the prioritized needs and availability of transportation revenues. This section provides a listing of the major projects included as Cost Affordable in the LRTP along with a series of maps and detailed funding tables.

Roadway Capacity Projects

The 2045 Cost Affordable roadway network includes significant capacity improvements throughout Pasco County. Highlights of these roadway capacity projects include the following:

Committed Project (2020 – 2024)

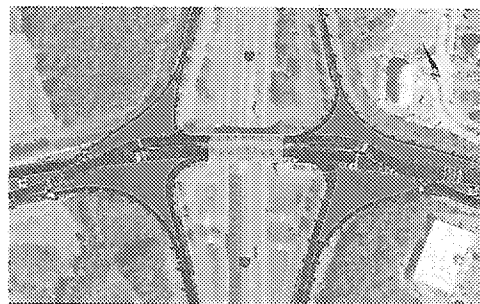
- Collier Pkwy: Bell Lake Road to Parkway Blvd widen to 4 lanes
- Clinton Ave Ext: from Uradco Place (east of I-75) to Fort King Road construct new/widen to 4 lanes
- Little Road: from Trinity Blvd to SR 54 widen to 6 lanes
- Overpass Road and I-75 Interchange
- Ridge Road: from Moon Lake Road to US 41 construct new 4 lanes and add interchange at Suncoast Parkway
- SR 52: from Suncoast Parkway to US 41 widen to 4 lanes
- Trinity Blvd: from Little Road to SR 54 widen to 4 lanes
- US 41: from N of Connerton Blvd to S of SR 52 widen to 4 lanes
- Wesley Chapel Blvd: from SR 56 to Oakley Blvd widen to 6 lanes



The recently completed SR 56 extension to US 301 provides a continuous corridor across southern Pasco County.

East/West Roadway Projects (2025 – 2045)

- North County Line Road: from East Road to Shady Hills Road widen to 4 lanes
- Overpass Road Ext: from I-75 to US 301 construct new 4 lanes
- South County Line Road: from Dale Mabry Hwy to I-75 widen to 4 lanes
- SR 52: from US 41 to Old Pasco Road widen to 4 lanes
- Tower Road: from Gunn Hwy to Sunlake Blvd construct new/widen to 4 lanes
- Zephyrhills West Extension: from SR 54 to US 301 construct new/widen to 4 lanes
- Construction of several developer roadways in the central and east portion of the county



Florida DOT Diverging Diamond Interchange currently under construction at SR 56 and I-75.

Tower
Road
East
to U.S.
41

APPENDIX # 2

PASCO COUNTY'S DESCRIPTION TO ACOE'S HAYNE HAYES OF THE SEGMENTS OF TOWER ROAD ALREADY CONSTRUCTED AS OF APRIL 11, 2017.

COMMENT INSERT—ALMOST 3 YEARS AGO ON APRIL 11, 2017, PASCO COUNTY BELOW RESPONDED TO ACOE PROJECT MANAGER SHAYNE HAYES THAT, AT THAT TIME

“...approximately 6.56 miles of roadway have been constructed or are under construction.”

NOW IN 12/2019, TO THAT FORMER 6.56 MILE FIGURE REPORTED BY PASCO COUNTY, MUST BE ADDED THE ADDITIONAL 1.2 MILES OF CONSTRUCTION NEWLY REPORTED IN THIS COMMENT TO MAKE 7.76 MILES OF THE TOWER ROAD ALTERNATIVE SOON TO BE AVAILABLE FOR TRAFFIC. OUR FIGURES DO NOT MATCH THOSE OF PASCO COUNTY. WHERE THEY GOT THE 6.56 MILE FIGURE FOR TOWER ROAD ALREADY BEING CONSTRUCTED OR THEN UNDER CONSTRUCTION BACK IN 2017 IS ANYBODY'S GUESS. OUR RECENT AND PAST ON SITE VISITS, PHOTOS AND GOOGLE MAP MEASUREMENTS DO NOT SUPPORT THE ABOVE DATA PROVIDED BY PASCO TO THE ACOE IN 2017.

THIS IS YET ANOTHER EXAMPLE OF THE UNRELIABILITY OF DATA PROVIDED BY PASCO COUNTY. ONLY AN ACOE-REQUIRED EIS FOR THIS APPLICATION CAN PROVIDE THE RELIABLE DATA NEEDED BY THE FEDERAL AGENCIES TO DETERMINE THE TRUE LEDPA. ANYTHING SHORT OF THAT WOULD ALMOST CERTAINLY BE MET WITH A REMAND BY THE FEDERAL JUDICIARY.



April 11, 2017

Mr. Shayne Hayes, Project Manager
Pensacola Permits Section
US Army Corps Engineers, Jacksonville District
41 North Jefferson Street, Suite 301
Pensacola, FL 32502

Re: SAJ-2011-00551 (SP-TSH) – Ridge Road Extension

Subject: Response to Request for Additional Information dated March 10, 2017

Dear Mr. Hayes:

In response to the Request for Additional Information (RAI) dated March 10, 2017 from the Jacksonville District Corps of Engineers (Corps) we are providing this letter and enclosures. The co-applicant, Florida's Turnpike Enterprise, has reviewed the RAI and has confirmed that there were no items that related to its segment of the project. The intent of this response letter is to clarify, to the Corps, some of the issues raised by the submitted comments from Citizens for Sanity.Com, Incorporated (CFS) on the proposed project.

We have repeated each request for information comment/question below and follow each with a response in *italics*.

1. CFS asserts that Pasco County entered into a legal contract with the owners of the Bexley Ranch and agreed to provide an at-grade intersection in the vicinity of Station 355 in exchange for a gift of right-of-way (ROW). Pursuant to our discussions during the November 2016 field meeting and based upon the most recent exhibits provided to the Corps, it is the Corps' understanding that a bridge would be utilized at this location and that no additional access to the Ridge Road Extension would be provided at that location. Will Pasco County be obligated to provide at-grade access pursuant to the referenced contract? If a permit were issued for extension of Ridge Road, does Pasco County anticipate seeking a permit modification to allow an at-grade intersection at any location east of Suncoast Parkway other than the connection to the mixed-use property located just east of Suncoast Parkway, generally in the vicinity of Station 295.

Response: Pasco County did enter into an agreement with the owners of the Bexley property through which the proposed Ridge Road Extension (RRE) will pass. The agreement was to provide access for County and Consultant staff to the Bexley property for the purpose of completing surveys necessary to support the preparation of the Corps permit application.

COUNTY ADMINISTRATION

West Pasco Government Center | 8731 Citizens Drive, Suite 340 | New Port Richey, FL 34654
mbaker@pascocountyfl.net | 727.847.8125

Shayne Hayes
April 11, 2017
Page 17

a. Please provide an estimate of the total length of roadways that are substantially within the Tower Road, Alternative 10, alignment, that have been constructed, are under construction, or have been authorized for construction by Pasco County. The intent of this request is to have a factual understanding of the extent of this roadway that has been constructed or is currently authorized for construction.

Response: Within the Tower Road, Alternative 10 alignment, approximately 6.56 miles of roadway have been constructed or are under construction. The segments of roadway which have been or are being constructed fall within the Starkey or Bexley MPUDs and constitute the extent of the construction which is the responsibility of those developers (see Enclosure G, Approved and in Effect Starkey MPUD Conditions of Approval and Enclosure H, Approved and in Effect Bexley MPUD Conditions of Approval). Pasco County has not permitted design plans and no developers are committed to construction of any other segment of Tower Road. Any future commitments with developers for construction of additional segments of Tower Road would likely be negotiated in exchange for Mobility Fee Credits and therefore the costs of construction would be reimbursed by the County.

APPENDIX # 3

VERIFICATION FROM PASCO'S OWN SUBMITTALS TO THE ACOE, OF THE TOTAL LENGTH OF ALTERNATIVE # 10, 4-LANE TOWER ROAD TO BE 11.87 MILES.

APPENDIX B-4

Alternative No: 10- 4-Lane Tower Rd									
Existing Typical Section Tower West:		Undeveloped/Dirt Road							
Existing Typical Section Tower East:		Dirt Road							
			Grass Length		Net Length			Bridge Length	Comment
Tower Rd. West:	1	Starkey Blvd. to a point approx 1/4 mile west on Trinity rd.	1.525		1.52				
	2	West of Trinity Rd. to 1/2 mile East of Trinity Extension	0.75		0.75				
	3	East of Trinity Rd. to Eastern Boundary of Starkey	1.13		1.13				
	4	Eastern Boundary of Starkey to Western Boundary of Behrke (Astrum)	0.66		0.66				
	5	Western Boundary of Behrke (Astrum) to Eastern Boundary of Behrke	1.07		1.07				
	6	Eastern Boundary of Behrke to Sunset	0.82		0.74			0.076	Bridge over Sunset
Tower Rd. East:	7	Sunset to Bexley Ranch Blvd.	0.63		0.63				
	8	Bexley Ranch Blvd. to Future Balantree connection	0.84		0.84				
	9	Future Balantree connection to Eastern Boundary of Bexley Ranch	2.15		2.15				
	10	Eastern Boundary of Bexley Ranch to US 41	2.27		2.27			0.026	Bridge over Railroad
County Roadway Construction Cost									
Side	Description	Length (miles)	FOOT Const. Cost/Mile	Const. Cost	MOT (Yes or No)	MOT Cost	Modification	Subtotal	Adjusted Subtotal (B54)
Tower Rd. West:	1 New 4-Lane Urban with 5' SW and C&G	1.52	\$6,852,753	\$10,385,785	No	\$0	\$1,086,578	\$11,472,363	\$9,710,709
	2 New 4-Lane Urban with 5' SW and C&G	0.75	\$0	\$0	No	\$0	\$0	\$0	\$0
	3 New 4-Lane Urban with 5' SW and C&G	1.13	\$6,852,753	\$7,721,011	No	\$0	\$772,101	\$8,493,112	\$7,219,145
	4 New 4-Lane Urban with 5' SW and C&G	0.66	\$6,852,753	\$4,538,617	No	\$0	\$453,962	\$4,992,579	\$4,216,492
	5 New 4-Lane Urban with 5' SW and C&G	1.07	\$6,852,753	\$7,311,646	No	\$0	\$731,105	\$8,042,751	\$6,805,828
	6 New 4-Lane Urban with 5' SW and C&G	0.74	\$6,852,753	\$5,081,558	No	\$0	\$508,357	\$5,590,915	\$4,753,136
Tower Rd. East:	7 New 4-Lane Urban with 5' SW and C&G	0.63	\$6,852,753	\$4,334,634	No	\$0	\$433,463	\$4,768,098	\$4,024,853
	8 New 4-Lane Urban with 5' SW and C&G	0.84	\$4,949,624	\$4,065,124	No	\$0	\$405,512	\$4,472,737	\$3,801,826
	9 New 4-Lane Urban with 5' SW and C&G	2.15	\$6,852,753	\$14,630,419	No	\$0	\$1,460,042	\$16,090,461	\$13,795,542
	10 New 4-Lane Urban with 5' SW and C&G	2.27	\$6,852,753	\$15,527,680	No	\$0	\$1,553,788	\$17,081,468	\$14,527,731
Subtotal Roadway Construction Costs								\$80,970,875	\$68,825,242

11.87 miles

MAPS OF TOWER ROAD ALTERNATIVE # 10 EAST OF THE SUNCOAST PARKWAY TO US 41. THIS SECTION IS DESIGNED TO AID MEMBERS OF THE FEDERAL JUDICIARY IN UNDERSTANDING THE SEGMENTS OF TOWER ROAD THAT HAVE BEEN COMPLETED AND ARE YET TO BE COMPLETED, EAST OF THE PARKWAY.

This aerial map shows the proposed development area, which is outlined in white. The map includes the existing road network and the proposed road layout. The proposed road layout is shown in white, and the existing road network is shown in grey. The map also shows the location of the proposed development in relation to the existing road network and the proposed road layout. The word "Google" is visible in the bottom right corner of the map.

Imagery ©2019 Maxar Technologies, U.S. Geological Survey, Map data ©2019 500 ft

50 Lake
B.W.D.

Measure distance
Total distance: 3,459.62 ft (1.05 km)

Measure distance
Total distance: 3,459.62 ft (1.05 km)

There are only 3,465 feet of unpaired ROW for Tower Road east of
sunlake Blvd. After that 3,465 foot unpaired section, Tower Rd. is paired
for 1.86 miles (see next map.)

THE MAP BELOW SHOWS THE 1.86 MILE SEGMENT OF TOWER ROAD ROW JUST EAST OF THE UNPAVED 3,465 FOOT SEGMENT SHOWN ABOVE. THIS SEGMENT IS PAVED AND IN USE BY RESIDENTS LIVING ALONG THIS SECTION OF TOWER ROAD.



Sunlake Blvd.

Measure distance
Total distance: 1.86 mi (3.00 km)

US 41

The 1.86 mile segment of Tower Road already paved (2 lanes) & in use. The final (eastern) segment of Tower Road will involve a straightening to go directly to U.S. 41 (see next map).

<https://www.google.com/maps/@28.2382147,-82.4803054,2635m/data=!3m1!1e3>

THE MAP BELOW SHOWS THE 2,246 FOOT NEW, TO BE STRAIGHTENED, EXTENSION SEGMENT OF TOWER ROAD TO CONNECT DIRECTLY TO U.S. 41 AT CALIENTE BLVD.



Imagery ©2019 Maxar Technologies, U.S. Geological Survey, Map data ©2019 1500 ft

CSX RR tracks

Measure distance
Total distance: 2,246.48 ft (684.73 m)

Current northern segment of
Tower Rd. NOT to be used.

2,246 foot extension of Tower Rd
to connect to U.S. 41 at Caliente
Blvd. From US 41 Tower is planned
to go east to Shreveport off.
THAT connects (N) to SR 52

<https://www.google.com/maps/@29.2485868,-82.4766466,3938m/data=!3m1!1e3>

THE MAP BELOW SHOWS THE FAR WESTERN 3,745 FOOT SEGMENT OF TOWER ROAD ROW JUST EAST OF THE PROPOSED INTERCHANGE OF TOWER ROAD WITH THE SUNCOAST PARKWAY. THIS SEGMENT MUST BE CONSTRUCTED BY THE BEXLEY RANCH MPUD.



Imagery ©2019 Maxar Technologies, U.S. Geological Survey, Map data ©2019 1000 ft

Tower Road Segment
Measure distance
Total distance: 3,745.01 ft (1.14 km)
3,745-foot segment to be constructed by Bexley Ranch MPUD from proposed interchange of Tower Road & the Suncoast Parkway east to the current beginning of Tower Road in the Bexley MPUD.

<https://www.google.com/maps/@28.2171725,-82.5187185,3943m/data=!3m1!1e3>

APPENDIX # 5

EVIDENCE THAT THE FTE IS NOW CONDUCTING A PD&E STUDY TO DETERMINE THE FEASIBILITY OF ADDING LANES TO THE CURRENT 4-LANE SUNCOAST PARKWAY BETWEEN SR 54 AND SR 52.

http://www.floridasturnpike.com/content/Work%20Program/FY-2018/WP%20Project%20Summary_D7_FINAL.pdf

Florida's Turnpike Enterprise Tentative Five-Year Work Program - FY 2018/19 thru FY 2022/23 Summary of Projects

FDOT District Seven

Pasco County Projects

Widening of the Suncoast Parkway / SR 589 from State Road 54 (MP 19) to State Road 52 (MP 27) FPN: TBD

The project widens a segment of the Suncoast Parkway / SR 589 from State Road 54 to State Road 52. The number of lanes will be evaluated via PD&E study. This funding is for the design phase of the project. The FPN is to be determined. Project Length: 8.0 miles Phase Fiscal Year 5 Year Total FY 2019 FY 2020 FY 2021 FY 2022 FY 2023 PE \$0 \$0 \$0 \$0 \$20,000,000 \$20,000,000 Total \$0 \$0 \$0 \$0 \$20,000,000 \$20,000,000.